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November 16, 2015

VIA ECF

The Honorable Michael A. Hammer, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

**Re: *WAG v. Multi Media, LLC, et al. (14-cv-02340);*
 WAG v. WMM LLC, et al. (14-cv-02345);
 WAG v. FriendFinder Networks Inc., et al. (14-cv-03456);
 *WAG v. WebPower, Inc., et al. (15-cv-03581)***

Dear Judge Hammer,

We represent Defendants MultiMedia, LLC, WMM LLC, FriendFinder Networks, Inc. and WebPower, Inc. in the above-captioned matters. We write in response to Plaintiff WAG Acquisition L.L.C.'s ("WAG") letters to the Court (*e.g.*, D.I. 65 in 2:14-cv-02340) and the Court's ensuing Letter Orders (*e.g.*, D.I. 66), scheduling a Rule 16 conference for December 7, 2015.

WAG informed the Court that the Patent Trial and Appeal Board ("PTAB") has denied three of the four petitions for *Inter Partes* Review ("IPR") regarding the four patents in suit. However, Defendants will be filing a motion for reconsideration this week regarding two of the three denied IPRs, pertaining to U.S. Patent Nos. 8,327,011 and 8,122,141. We anticipate that the reconsideration motion will be resolved by January 2016. Moreover, while most of the Defendants have answered WAG's operative complaints, we understand that the Defendants in *WAG Acquisition, L.L.C. v. Sobonito Investments, Ltd.*, are engaged in limited personal jurisdiction discovery (Coolvision Ltd.), will be moving to dismiss on personal jurisdiction grounds (I.M.L. SLU), or has not been served with WAG's Complaint (Sobonito Investments, Ltd.). Accordingly, we ask that the Rule 16 Conference be adjourned to January 2016 in order for the above events to proceed to conclusion.

If Your Honor is not inclined to grant the above adjournment, Defendants request that the December 7, 2015 conference be adjourned to December 14, 15 or 16, due to a scheduling conflict with lead counsel for the above Defendants. We understand that lead counsel for Defendants in *WAG v. Gattyman*, 14-02832 and *WAG v. Flying Crocodile*, 14-02674 also are unavailable on December 7, as well. We have conferred with counsel for WAG, who advised that they are available on December 14 – December 16, 2015. We, therefore, respectfully request that the Court reschedule the parties' Rule 16 conference to one of those dates, at the Court's convenience.

We thank the Court for its courtesies and consideration. Should Your Honor have any questions, we are available at the Court's convenience.

Respectfully,

s/ Keith J. Miller

Keith J. Miller

cc: All counsel of record (via ECF)